

1           Q     This would have been just before the Thanksgiving  
2     1992?

3           A     I remember going and talking to John Rhea, and  
4     whoever the program director was, and I don't remember his  
5     name, we terminated, but Mike Rice was not there from my  
6     remembering. I remember John Rhea and I were there. And it  
7     was John Rhea's idea to fire him.

8           Q     Well, when you went to Terre Haute, isn't it a  
9     fact that you had Bianchi's severance pay check already cut  
10    and with you to present to him?

11          A     That's correct, probably, because the way Indiana  
12    law state that if you don't give notice, you have to pay  
13    them within so many hours.

14          Q     Isn't it a fact that John Rhea was not in favor of  
15    Bianchi's termination?

16          A     No.

17          Q     Isn't it a fact that he protested on the grounds  
18    that Bianchi's wife was pregnant, and it was right before  
19    the holidays?

20          A     No. That was -- I know who you are talking about,  
21    yeah. He was the one who had -- in fact, he made the  
22    statement to me, "You know, what am I going to do. My wife  
23    is pregnant."

24          Q     Who made that statement?

25          A     The program director.

1 Q Assuming it was Mike Bianchi.

2 A Yeah.

3 Q You don't remember the name --

4 A No.

5 Q -- is that correct?

6 A Because one of the reasons being is lots of times  
7 you get a resume, you get 50 resumes when you interview for  
8 a job. And most of the time announcers and that their  
9 resumes come in with whatever particular air name that they  
10 are using at that time, and that's usually not their, you  
11 know, their legal name.

12 And so you in the course of employment you may  
13 know them by two or three different names per se. So  
14 consequently, you know, remembering who they are is not  
15 always, you know, the easiest.

16 Q When you went -- when you made this trip to  
17 terminate this program director, do you recall how you got  
18 to the station? Did you drive there?

19 A Oh, I always drive.

20 Q Do you recall in this particular time, did Mike  
21 Rice accompany you?

22 A I don't remember him being there. Now --

23 Q Do you recall Paul Hanks being with you?

24 A No.

25 Q Could you identify Paul Hanks for the record?

1           A     Yeah, he was a program director for a station in  
2     Columbia, Missouri.

3           Q     Do you recall getting in a van after Mike Bianchi  
4     was fired, and driving back to, I guess, St. Peters?

5           A     There was one time, and I don't remember if that  
6     was the same time, there was one time when Paul Hanks and  
7     Mike Rice and I went there for the purpose of Paul Hanks  
8     doing some computers work on the selector. But I don't  
9     remember if that's the same time or not.

10                I've made so many trips to Terra Haute, I mean  
11     they run together sometimes.

12           Q     Isn't it a fact that after you fired Mr. Bianchi  
13     that on the trip back to St. Peters that Mike Rice during  
14     that trip instructed you to fire John Rhea?

15           A     No, I don't recall that. We may have had a  
16     discussion about John Rhea.

17           Q     Do you recall driving back with Mike Rice after  
18     firing Mr. Bianchi?

19           A     I remember a trip back from Terra Haute with Mike  
20     and Paul Hanks, but I don't remember if it was after that  
21     particular incident.

22           Q     Do you recall during the discussion with Michael  
23     Rice after you fired Mr. Bianchi, and during your trip back  
24     to St. Peters, Mike Rice saying to Paul Hanks, when he was  
25     discussing the firing of John Rhea, "These are the kinds of

1 meetings Janet and I have that no one gets to know about"?

2 A I don't know if Mike said that or not.

3 Q You have no recollection of that having been said?

4 A Lots of times when I'm in the car, and I'm not  
5 driving, I'm reading a book, and the world goes by me,  
6 whether it's on business or pleasure.

7 Q When following the firing of Mr. Bianchi did you  
8 begin looking for a new general manager for the Terra Haute  
9 operation?

10 A Oh, probably in -- I think it was after that  
11 particular trip that I realized that, as the saying goes,  
12 that there were not a lot of happy campers in that radio  
13 station.

14 JUDGE STEINBERG: Can I interrupt?

15 Your question was how soon after firing Bianchi  
16 did they start looking for another general manager for the  
17 Terra Haute station?

18 MR. ZAUNER: Right, not --

19 JUDGE STEINBERG: Did you mean Mr. Rhea?

20 MR. ZAUNER: No, they fired Mr. Bianchi.

21 JUDGE STEINBERG: Okay, according to my notes Mr.  
22 Rhea was fired around October '91.

23 THE WITNESS: No, December of '91.

24 JUDGE STEINBERG: Okay.

25 THE WITNESS: He was there one year.

1 JUDGE STEINBERG: Okay, so Rhea was fired in  
2 December '91. You mentioned that Mr. Bianchi -- well, you,  
3 Mr. Zauner, mentioned that Mr. Bianchi was fired around  
4 Thanksgiving '92.

5 MR. ZAUNER: Your Honor.

6 JUDGE STEINBERG: And the witness didn't remember;  
7 is that correct?

8 THE WITNESS: Yeah, I don't remember when he was  
9 terminated.

10 MR. ZAUNER: My information is that in fact -- I  
11 understand where you are coming from, Your Honor.

12 JUDGE STEINBERG: Yes.

13 MR. ZAUNER: The information that I have --

14 JUDGE STEINBERG: You had no general manager for a  
15 year?

16 MR. ZAUNER: Mr. Bianchi had not been a general  
17 manager.

18 JUDGE STEINBERG: No, he was program director.  
19 But why would they be looking for another general manager if  
20 they just fired a program director?

21 I mean, there is something there that is  
22 confusing.

23 MR. ZAUNER: You are correct, Your Honor. The  
24 information that we have is that Mr. Rhea was not let go  
25 until December of '92, and that he was hired in -- let's see

1 if I can --

2 JUDGE STEINBERG: Well, the record here shows he  
3 was hired December '90.

4 MR. ZAUNER: That's her testimony. That's  
5 correct.

6 JUDGE STEINBERG: And fired in December '91.

7 THE WITNESS: He was there for one year.

8 Now, without looking at his personnel record, I  
9 don't know exactly what time frame he was there.

10 MR. ZAUNER: Whether it was '90 to '91, '91 to  
11 '92, or '92 to '93.

12 THE WITNESS: No, I know it wasn't '92 to '93. I  
13 mean, it wasn't that late.

14 MR. ZAUNER: So it could have been '91 to '92.

15 THE WITNESS: I don't think so. I think it was  
16 '90 to '91. But I would have to, you know, see personnel  
17 files to know.

18 MR. ZAUNER: Could we ask the Licensees, could you  
19 direct the Licensees to check that date for us and supply it  
20 to the record, Your Honor?

21 JUDGE STEINBERG: Well, how important is it?

22 MR. ZAUNER: Well, I think it is important. I  
23 think it will prove to be important.

24 JUDGE STEINBERG: Can you make a note to do that,  
25 just check the hiring and firing dates of John Rhea, and

1 maybe enter it into the record in a stipulation?

2 MR. GAFFNEY: We would be required to provide  
3 that? It's the burden of proof of the Bureau, though, Your  
4 Honor.

5 JUDGE STEINBERG: Well, but they can't prove this  
6 without information from you. I mean, you --

7 MR. GAFFNEY: Right, and they had time to prepare  
8 their case and gather information to satisfy their burden of  
9 proof, and now we are at the hearing.

10 JUDGE STEINBERG: Well, right now -- right now  
11 what the record shows is he was hired in 12-90, in December  
12 of '90, and fired in December of '91.

13 MR. GAFFNEY: That's correct.

14 JUDGE STEINBERG: That's what we have now.

15 MR. GAFFNEY: That's the record.

16 JUDGE STEINBERG: But I am asking you to check and  
17 provide the accurate date.

18 (Pause.)

19 JUDGE STEINBERG: Okay, the pending question was  
20 then how soon after Bianchi was fired did you look for  
21 another general manager. I don't know that that was  
22 answered, but I don't even know if the question is accurate.

23 MR. ZAUNER: Yes, the question is problematic at  
24 this point because of the lack of the date.

25 JUDGE STEINBERG: You wouldn't have let the

1 station without a general manager for a year, would you?

2 THE WITNESS: Well, we had someone after John Rhea  
3 left, after I terminated him, appointed someone as an  
4 interim manager in the process of looking for another GM,  
5 because by that point in time, guys, remember, this stuff  
6 was in the paper, and it was in all the rag sheets and all  
7 that kind of stuff, so it wasn't a real easy job to find a  
8 general manager, you know.

9 BY MR. ZAUNER:

10 Q When you say "all the stuff," you mean the  
11 problems Michael Rice was having?

12 A Yes, via our competitors. I mean, it was a big  
13 story.

14 Q Do you recall an announcer by the name of -- well,  
15 let me go back.

16 You indicated Michael Rice was involved in the  
17 firing of one general manager to the extent that he was  
18 present when you fired John Rhea?

19 A That is correct.

20 Q Did he have any other involvement in the firing of  
21 general managers at the stations?

22 A When?

23 Q After April of 1991.

24 A No.

25 Q Let me ask you the same question with regard to



1 program directors.

2 Did Michael Rice have any involvement in the  
3 hiring or firing of program directors after April of 1991?

4 A He was not involved in hiring, no.

5 Q Or the firing?

6 A No.

7 Q Ask you the same question with regard to  
8 announcers for the period following April of 1991.

9 Was Mike Rice involved in the hiring or firing of  
10 announcers for any of the stations?

11 A Not that I know of.

12 Q Do you recall an announcer by the name of Holler,  
13 H-O-L-L-E-R, who worked at either WZZQ or WBOW? His mother  
14 worked as a bookkeeper for WBOW.

15 A Yes. I mean, I know the name because I know the  
16 mother, Margaret.

17 Q Do you remember that the son had worked at the  
18 station for a short while?

19 A Very short period of time.

20 Q Isn't it a fact that he was fired after just a  
21 very short period on the air?

22 A Yes.

23 Q And isn't it a fact that it was Mike Rice that  
24 ordered him fired?

25 A No, John Rhea -- Mike made some comments regarding

1 him. John Rhea never wanted to hire him in the first place  
2 because his mother worked there. But pardon the expression,  
3 he didn't have the guts not to hire him nor to really say  
4 you're not good, I'm going to fire you.

5 So, you know.

6 Q So who made the ultimate decision to fire him?

7 A John Rhea fired him.

8 Q Then he did ultimately decide to fire him.

9 A Yes.

10 Q Is that correct?

11 Did he discuss that with you, the firing of Mr.  
12 Holler?

13 A Yes, he told me that he was going to fire him.

14 Q Isn't it a fact that John Rhea was opposed to  
15 firing Mr. Holler?

16 A No, that's not true.

17 Q Isn't it a fact that you told him that Mike Rice  
18 wanted him fired, and that Mr. Rice owns the stations, and  
19 can do what he wants to do?

20 A I may have said, "Mike can do what he wants to." I  
21 mean, I can't control what any other individual does.

22 Q Do you know whether Mike Rice instructed John Rhea  
23 to fire Mr. Holler?

24 A I don't know.

25 Q Did John Rhea ever tell you that that was the

1 case?

2 A He might have. There were numerous things that  
3 John Rhea told me that were not true. That was one of the  
4 reasons he was terminated.

5 JUDGE STEINBERG: Yes, but you don't have a  
6 specific recollection of John Rhea telling you that Michael  
7 Rice directed Mr Holler's firing?

8 THE WITNESS: No.

9 BY MR. ZAUNER:

10 Q And do you have a specific recollection of any  
11 point telling Mr Rhea that, with regard to the firing of  
12 Mr. Holler, that Mike Rice owns the station and he can do  
13 what he wants to do? Do you have a specific recollection to  
14 that?

15 A I may have made that statement to John, but I  
16 don't know if it was in regard to that particular incident  
17 or not.

18 Q Well, with regard to that particular incident, I  
19 understand your answer is you may have, you may not have.

20 But do you have any specific recollection of  
21 having done so?

22 A I may have made that statement at a given time to  
23 John Rhea. I don't want to say yes or no because I don't  
24 remember.

25 Q You don't have any specific recollection of having

1 done so --

2 A No, that's correct.

3 Q -- is that correct?

4 A I don't.

5 Q Okay, that was the answer I was looking for.

6 Can you identify a Sean Madden?

7 A I think he was an announcer.

8 Q Was he an assistant program director of KFMZ?

9 Does that ring a bell with you?

10 A Could be.

11 Q And then he was an announcer and he moved to an  
12 evening position I think, at the station.

13 Does that --

14 A He may have.

15 JUDGE STEINBERG: But you don't remember?

16 THE WITNESS: Well, I mean, I remember the name,  
17 but exactly what air shift he did or what, you know, without  
18 looking at payroll records I couldn't tell you.

19 BY MR. ZAUNER:

20 Q Do you have any recollection of Paul Hanks telling  
21 you that Michael Rice had directed him to get rid of Mr.  
22 Madden?

23 A No.

24 Q Do you remember when Mr. Madden worked for the  
25 station?

1           A     Oh, not exactly. I can remember some other things  
2 about him.

3           Q     Well, just roughly, do you remember the year? Was  
4 it in '92, '93? Can you place it at all? And can you place  
5 it with regard to Mr. Rice's hospitalization? Was it after  
6 the hospitalization or before?

7           A     I don't know.

8           MR. ZAUNER: Your Honor, the Bureau would request  
9 that you direct the Licensee to provide the date showing Mr.  
10 Madden's employment.

11           JUDGE STEINBERG: Not on the basis of what we have  
12 in the record. I mean, what we have is questions from you  
13 saying that Hanks told Ms. Cox that Rice told Hanks to get  
14 rid of Madden. And we have Ms. Cox saying, "I don't  
15 remember."

16                     And so without -- isn't that correct?

17           THE WITNESS: That's correct.

18           JUDGE STEINBERG: And so you haven't tied it in,  
19 and I'm not going to ask them to provide those dates because  
20 I don't think it will prove very helpful.

21           BY MR. ZAUNER:

22           Q     Isn't it a fact that when Mr. Hanks told you that  
23 Mike Rice had directed him to get rid of Mr. Madden --

24           MS. SADOWSKY: Objection.

25           JUDGE STEINBERG: Wait. Just one person a

1 witness. So if --

2 MR. GAFFNEY: He didn't finish the question.

3 MS. SADOWSKY: But the premise of the question was  
4 not her testimony.

5 JUDGE STEINBERG: Okay.

6 MR. ZAUNER: Well, she can deny it then.

7 JUDGE STEINBERG: Start again because I lost  
8 whatever piece you managed to get out.

9 BY MR. ZAUNER:

10 Q Isn't it a fact that when Paul Hanks told you that  
11 Mike Rice had directed him to get rid of Mr. Madden, you  
12 told Paul Hanks that if he did so, he should be prepared to  
13 lose Sally?

14 MR. GAFFNEY: Objection, Your Honor,  
15 mischaracterizes the testimony that's been given.

16 MR. ZAUNER: This is cross-examination, and I am  
17 setting a question which the witness is fully capable of  
18 denying if it's not true.

19 MR. GAFFNEY: Which --

20 JUDGE STEINBERG: Yes, but there are multiple  
21 parts.

22 MR. ZAUNER: Okay, I will break it down.

23 JUDGE STEINBERG: Break it down.

24 BY MR. ZAUNER:

25 Q Isn't it a fact that Paul Hanks told you that Mike

1 Rice had directed him to get rid of Mr. Madden?

2 A No, that's not a fact, because I don't recall it.

3 Q Isn't it a fact that when Mr. Hanks told you that  
4 Mike Rice had directed him to get rid of Mr. Madden, you  
5 responded that if he did so he would lose Sally?

6 MR. GAFFNEY: Objection, Your Honor.

7 JUDGE STEINBERG: Okay, did you ever tell --

8 THE WITNESS: I remember telling Paul Hanks that  
9 when he wanted to fire this particular individual, that he  
10 was going to lose Sally as an employee because they  
11 cohabitate.

12 JUDGE STEINBERG: Sean, this particular employee  
13 being Sean Madden?

14 THE WITNESS: Right.

15 JUDGE STEINBERG: So basically, okay, I think  
16 that's -- I'm going to leave it there.

17 Sally and Paul Madden cohabitated?

18 THE WITNESS: No. Sean and Sally.

19 JUDGE STEINBERG: What did I say?

20 MR. MASTANDO: You said Paul.

21 JUDGE STEINBERG: I apologize.

22 MR. ZAUNER: There are a lot of names here and  
23 some of these individuals have two names --

24 THE WITNESS: Right, right.

25 MR. ZAUNER: -- as the witness has indicated. It

1 makes it much more complicated that --

2 THE WITNESS: Right.

3 JUDGE STEINBERG: Sean Madden and Sally  
4 cohabitated?

5 THE WITNESS: That's correct.

6 JUDGE STEINBERG: And you told --

7 THE WITNESS: When Paul Hanks said that he was  
8 going to terminate, he wanted to fire him, and I mean, there  
9 is some other extenuating circumstances involved right there  
10 too, but I said to him, "If you do, be prepared to lose  
11 Sally."

12 JUDGE STEINBERG: And what did you mean by that?

13 THE WITNESS: She was going to quit, I mean,  
14 because if he got fired, he wasn't going to have a job, and  
15 he was going to have to go some place where he was going to  
16 get a job, and he had a noncompete.

17 JUDGE STEINBERG: So he couldn't stay --

18 THE WITNESS: He couldn't go down the street.

19 JUDGE STEINBERG: But he was in Columbia.

20 THE WITNESS: But that's okay, he could have gone  
21 because he wasn't very good anyway.

22 BY MR. ZAUNER:

23 Q Do you recall whether this all -- whether Sean  
24 Madden left the station after April of 1991?

25 A I don't remember exactly when he left.



1 Q Do you know a Robert Kinnison, K-I-N-N-I-S-O-N?  
2 Does that ring any bells with you?

3 A No.  
4 What did he do?

5 Q He was an announcer, Saturday night announcer.

6 A No. I mean, the name doesn't ring a bell, and,  
7 you know, I don't know. He could have been a part-timer for  
8 a period of time I don't know.

9 Q Do you know a Lanny Pierce, P-I-E-R-C-E? Does  
10 that name ring any bells with you?

11 A Ugh-huh.

12 JUDGE STEINBERG: Is that a no?

13 THE WITNESS: No.

14 BY MR. ZAUNER:

15 Q You have no recollection of him?

16 A No. And there, again, if you said he was The  
17 Blade, then I might know who he is. I could put the face  
18 with the name, but that doesn't register with me from that  
19 standpoint.

20 Q What was the job or the duties of the station's  
21 managers with regard to programming on the stations?

22 A It was kind of varied from station to station.

23 Q Were they generally responsible for all aspects of  
24 the station operation, including the programming?

25 A Were they responsible for hiring and firing the

1 program director?

2 A Yes.

3 They were involved in that process, yes.

4 Q Did each station or groups of stations have its  
5 own program director?

6 A Yes.

7 Q And the program directors reported directly to the  
8 general manager?

9 A That's correct.

10 Q Was there a corporate promotion director, or  
11 anybody with that kind of title, who was responsible for  
12 more than just a certain station?

13 A Well, for awhile Paul Hanks kind of held that  
14 title, but that was a joke.

15 Q When he held that title, did the programming  
16 directors report to him then, or did they continue to report  
17 to the general manager, or --

18 A Well, there was only one other program director  
19 that reported to him, and that was -- and I don't say that  
20 he reported to him; they consulted together.

21 Paul was a person who loved title.

22 Q What was Paul's duties as a corporate program  
23 director?

24 A He reviewed the pay list of the station.

25 Q And he did it for his own station and for this one

1 other station?

2 A That is correct.

3 Q Was that WZZQ?

4 A That's correct.

5 Q And where was Paul located? Do you know?

6 A In Columbia, Missouri.

7 Q Columbia, okay.

8 To whom did Paul Hanks report?

9 A Richard Hauschild.

10 Well, when he originally worked there, he reported  
11 to the program director, because he originally came to work  
12 as an announcer. Then he became the program director. He  
13 reported -- at that time the general manager was Scott  
14 Boltz, and then later on when Scott quit, I hired Richard  
15 Hauschild, and he reported to Richard Hauschild.

16 Q Who gave Paul Hanks the title corporate program  
17 director?

18 A I don't know that anybody actually gave it to him.  
19 I think that was -- as I made the statement earlier, Paul  
20 loved titles. And it was something that worked good in  
21 dealing with R&R.

22 Q Well, how did it happen that the program directors  
23 at WZZQ was reporting or consulting with the program  
24 director from Columbia?

25 A Because the program directors were very

1     inexperienced that we had, even more inexperienced than what  
2     Paul was.

3             Q     Who was the program director at WZZQ?

4             A     Well, there were several different ones.

5             Q     Isn't it a fact that through a relatively short  
6     period of time you went through quite a few program  
7     directors at WZZQ, four or five?

8             A     I don't know if there that many, but there were  
9     several. I don't know that there were four or five.

10            Q     Were each of them during that period of time told  
11   to consult with Paul Hanks?

12            A     No, I don't think -- not all of them.

13            Q     But some of them were?

14            A     Again, in fact, I think there was one individual  
15   who really balked at that because he said he knew 10 times  
16   more than Paul Hanks would ever forget.

17            Q     Do you remember who that individual was, who  
18   balked?

19            A     Well, I can't remember what his name is. I can  
20   see his face very clearly, but I can't remember. You know,  
21   there again, he was one of those people who had five names  
22   he used, and so.

23            Q     Would the name Mike Steele?

24            A     Yeah, that's I think -- yeah, cause he's one who  
25   used numerous names like "The Arrow, The Sword."

1 Q And he was not happy being under the thumb of Paul  
2 Hanks?

3 A That's correct.

4 Q Who was it who determined that these program  
5 directors in Terra Haute should be controlled by Paul Hanks?

6 A They weren't controlled by Paul Hanks.

7 Q Should consult with Paul Hanks if that would be a  
8 better term? Was it you?

9 A Yes, and probably at that time there were two or  
10 three different individuals who I guess were at stations  
11 that had these similar types of formats, and they  
12 recommended, hey. two heads are better than one.

13 Q To you they made this recommendation?

14 A Yes.

15 Q Mike Rice had nothing to do with this decision to  
16 have the program director at Terre Haute consult with Paul  
17 Hanks?

18 A Not to my knowledge.

19 Q Do you know an individual by the name of Ben  
20 Jacobs?

21 A Yes.

22 Q Is it true his name is also Ben Orkranski?

23 A Orzinski.

24 Q Could you spell that? I couldn't?

25 A No, I can't, and he used another name besides that

1       also, but I don't recall what that is.

2           Q       Was it Orzinski?

3           A       That's his legal name. He used two different air  
4       names, I believe, that I know of.

5           Q       Do you remember when, we will call him Ben Jacobs,  
6       worked for the station?

7           A       Yes.

8           Q       Around when was that?

9           A       Date-wise, I don't know. I can remember him being  
10       there, but, you know, saying what the dates were, I don't  
11       know.

12          Q       Was it subsequent to April 1991?

13          A       I think so.

14          Q       Did Mike Rice ever suggest or direct you to fire  
15       or order the firing of Ben Jacobs?

16          A       No.

17          Q       Did Mike Rice ever tell you that he was firing Ben  
18       Jacobs or ordering him to be fired?

19          A       No, not that I recall.

20          Q       Isn't it a fact as part of the standard operating  
21       procedure for Mike Rice, after April 1, 1991, that he would  
22       listen to the stations, and if he didn't like what he heard  
23       by the announcers, he would come to you and tell you to have  
24       the announcers fired?

25          A       He came and made comments, but, you know, that

1 wasn't -- that didn't necessarily happen.

2 Q But he didn't direct you to fire anybody?

3 A No.

4 He might have said, "While you were in the  
5 Columbia area this weekend, did you hear so and do?"

6 "Yes."

7 "Well, don't you think he sounds terrible," or  
8 something of that nature.

9 And I would say, "Yes, but, you know the budget  
10 says X number of dollars."

11 JUDGE STEINBERG: In your relationship of working  
12 with Mike Rice, some people have different styles, and there  
13 are some people who come to somebody and say, "I don't like  
14 the work of John Doe." Now, they wouldn't have to say "Fire  
15 John Doe," but it was understood that if they didn't like  
16 the work of John Doe, John Doe ought to be fired.

17 Is that the way Mike Rice operated? Was that his  
18 management style?

19 THE WITNESS: He would make statements like that.  
20 He might come in today to Judge Steinberg and say, "Oh, you  
21 know, I think this guy is terrible." I can see him five or  
22 six days later and he would say, "This guy is great."

23 JUDGE STEINBERG: I mean, but was it Mike Rice's  
24 management style to direct people to do things by saying  
25 things indirectly, like "I don't like this guy," and then

1 everyone knows that means fire him?

2 THE WITNESS: I don't know what individuals  
3 presumed.

4 JUDGE STEINBERG: What did you presume?

5 JUDGE STEINBERG: I didn't. I mean, I did it on -  
6 - I made the business decisions on (a) different things:  
7 (a) what was the budget line; how did this individual fit  
8 in; where were we going to find somebody else; you know,  
9 multiple things; and ask the program director, you know,  
10 "What do you think?"

11 There are times that the program directors would,  
12 if they didn't like somebody or they wanted to fire  
13 somebody, they would say, "Hey, I talked to Mike about this  
14 and they think this guy is terrible."

15 Well, you know, what they did or what he did I  
16 could not control, especially after hours. But, you know,  
17 like I said, "Okay, where are you going to find the water  
18 walker?"

19 JUDGE STEINBERG: What's a water walker?

20 THE WITNESS: Well, you know, somebody who could,  
21 you know, using the phrase someone who could fill the  
22 position in the manner in which they were looking for on  
23 that kind of a notice.

24 JUDGE STEINBERG: So if Mr. Rice -- so if Mr. Rice  
25 made a comment to you that this announcer was bad, you



1 wouldn't take that as an order from him to fire this person?

2 THE WITNESS: That's correct.

3 BY MR. ZAUNER:

4 Q Can you identify a Mike Steel who had come from  
5 St. Louis?

6 A Yes. You mentioned, yes, back awhile ago.

7 Q And do you remember him being hired?

8 A Yes.

9 Q Do you recall around when he was hired time-wise?

10 A It would have been, I think, in '92 or something  
11 like that. I know it was on -- and the reason I can kind of  
12 remember that is because where our office was located at the  
13 time.

14 Q Who hired Mike Steel?

15 A I did.

16 Q How did you learn about Mike Steel?

17 A From another -- originally, I heard of him from  
18 another announcer in the area because the particular station  
19 where he worked, they were going to go digital, and there  
20 were going to be a lot of people being let go. I had heard  
21 him on the air, and I believe I said something to Mike one  
22 day, "Hey, I heard about this particular guy. Do you know  
23 him? Because Mike knew a lot of people in the broadcast  
24 industry.

25 And I think he was familiar with the name.